

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

UNITED FOOD AND COMMERCIAL
WORKERS UNION, LOCAL No. 663, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
AGRICULTURE,

Defendant.

Case No. 18-cv-2660 (JNE/TNL)

DECLARATION OF DAVID ERIC CARRASCO

I, David Eric Carrasco, declare as follows:

1. My name is David Carrasco. For the past month I have worked on the shackle table and before that I worked on final rail / doctor help at the Smithfield hog slaughter and food processing plant in Denison, Iowa.

2. Since approximately 2014, I have been a member of the United Food and Commercial Workers Union (UFCW) Local 440.

3. I have been a union steward for approximately 1 year. In that capacity, I handle grievances and serve as a representative of the local union in the plant.

4. As a final rail worker on the production line, I work alongside one other worker and a USDA inspector to make sure the meat is unadulterated. We pull ("rail in") hogs from the line to check trimmed and gutted carcasses for fecal matter, kidney abscesses, and stray pieces of backbone, heart or lungs.

5. Our jobs are dangerous. We work with a sharp hook in one hand and a knife in the other.

6. We also pull hogs that are approximately 200 lbs. We work quickly to keep up with the lines.

7. Sometimes the plant speeds up the lines in order to make its production numbers. When the lines speed up we rail hogs faster.

8. When we rail hogs faster, I experience pain and mobility issues in my shoulder. I get particularly bad pains when the lines speed up after lunch.

9. I have hooked myself by accident because of increased line speeds. I wear protective gear but I often stab or hook myself because we are moving so fast.

10. I have seen other workers get injured because of increased line speeds. For example, when the lines speed up, hogs fall more often. Before I was on final rail, I worked in the trolley room. I had hogs fall on me and I saw them fall on coworkers.

11. When hogs fall off the lines, workers have to rehang them. I am concerned that if more hogs fall, the people who rehang them risk more musculoskeletal injuries.

12. I once saw a woman cutting heads rushing to keep up with a fast line. One of the falling heads hit her. It bent her wrist and she looked badly injured.

13. Management told me that they will put in a second line and finish all the work that we currently do in 10 hours in 8 hours.

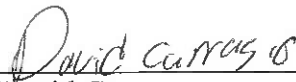
14. I am concerned that management is prepared to increase line speeds. I believe that my and my coworkers' risk of injury will increase if line speeds increase.

15. Coworkers have told me that they do not want line speed increases because they cannot keep their current pace without getting injured. They say they come to Smithfield to work and not to get hurt.

16. I recently bid to a different position that is referred to as "Shackle." I still occasionally perform the job of "Final Rail."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 2 2020.



David Carrasco